UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE SINOHUB SECURITIES LITIGATION

This Document Relates to: All Actions

No. 1:12-cy-08478-WHP

LEAD PLAINTIFF'S MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND APPROVAL OF PROPOSED PLAN OF DISTRIBUTION

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that on November 13, 2015, at 11:30 a.m., at the United States District Court for the Southern District of New York, Courtroom 20B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, or as soon thereafter as counsel may be heard before the Honorable William H. Pauley, III, United States District Judge, Lead Plaintiff will and hereby does move for an order and/or judgment (1) finally approving the settlement of this class action and dismissing the litigation with prejudice and approving the Plan of Distribution of settlement proceeds; and (2) certifying the Settlement Class for settlement purposes. Lead Plaintiff's motion is based upon Lead Plaintiff's Memorandum of Law in Support of Final Approval of Class Action Settlement and Plan of Distribution, the declarations submitted in support thereof, the Settlement Agreement, all other pleadings and matters of record, and such additional evidence or argument as may be presented in Lead Plaintiff's motion or at the hearing on Lead Plaintiff's motion.

Dated: October 23, 2015 SCOTT+SCOTT, ATTORNEYS AT LAW, LLP

/s/ Joseph P. Guglielmo

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Counsel for Lead Plaintiff Ellsworth Investments Limited

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 23, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 23rd day of October, 2015 at New York, New York.

/s/ Joseph P. Guglielmo
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